UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

	CIVIL ACTION NO. 04-CV11829 GAO
ROBERT S. STEPHENS, Plaintiff) }
V.) }
ROBERT MULHERN, individually	Ć
and as Police Chief of the Town of)
Groton,)
PETER S. CUNNINGHAM,)
individually and as a Selectman for)
the Town of Groton,)
THOMAS D. HARTNETT individually)
and as a Selectman of the Town of)
Groton,)
DANN CHAMBERLIN, individually)
and as a Selectman of the Town)
of Groton,)
"JOHN DOE" and)
THE TOWN OF GROTON,)

JOINT PRETRIAL AND SCHEDULING CONFERENCE STATEMENT

The parties hereby submit this Joint Pretrial and Scheduling Conference Statement in accordance with and pursuant to Local Rule 16.1(D)

I. Discovery Plan

Defendants.

Discovery and Motion Schedule

<u>Item</u>

1.	Automatic Disclosures under Rule 26(a)(1)	05/16/05
2.	Written Discovery Service Deadline	07/31/05
3.	Motions to Amend	06/30/05

4. Responses to Written 09/30/05
Discovery

5. Expert Disclosures Under 09/30/05 Rule 26(a)(2)

6. Rule 12 Motions 07/31/05

7. Completion of All Depositions 01/31/06

8. Rule 56 Motions 02/27/06

9. Final Pre-trial Conference 4/06

10. Trial To Be Scheduled

II. <u>Certifications under Rule 16.1</u>

See separate certifications.

ROBERT S. STEPHENS, By his Attorney,

ROBERT MULHERN, et al By their Attorneys,

/s/ Gregory D. Oberhauser

Gregory D. Oberhauser, (B.B.O.# 642209) 10 George St., Suite 220 Lowell, MA 01852 (978) 452-1116 (978) 452 -8199 /s/ Jeremy I. Silverfine Leonard H. Kesten (BBO# 542042)

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Date: 5/9/05